



SE-5J

April 09, 2007

Ms. Kelly Novotny  
609 Norton Drive  
Kalamazoo, MI 49001

Re: Allied Paper Superfund Clean-Up Site

Dear Ms. Novotny:

This letter is in response to question you had in your e-mail message of April 6, 2007. Thank you for taking the time to do this.

- In response to question 1, it is not possible to give determine the exact number of pounds stored at the Allied Paper Superfund site in OU#1. The Allied Paper disposal areas have existed for more than 50 years of operation. During the operating years of the papermill, approximately 1 million cubic yards of PCB-contaminated paper residuals were disposed on the facility, creating the Allied Paper Landfill. Approximately 150,000 cubic yards of PCB-contaminated residuals, soil, and sediment were added to the Allied Paper Landfill as a result of EPA's earlier Time Critical Removal Action at Byrant Mill Pond. The above materials were not pure PCB liquids that could be measured in pounds, but rather paper residuals, soil, and sediments that contained small quantities of PCBs.
- In response to question 2, one of the results of the negotiations was to require additional samples to be collected. The new data collected in 2006 confirmed the presence of PCB concentrations which exceeded 50 parts per million (PPM) in three localized hot spots in river sediments. This new data indicated the need to conduct a Time Critical Removal action.
- In response to question 3, approximately 95% of the PCB contaminated soil in the vicinity of the Plainwell Impoundment will be transported to the Allied Paper Superfund Site OU#1.

- In response to question 4, the Allied Paper landfill
- In response to question 5, in 1966, one area of the Landfill was licensed as a landfill to receive non-process waste. In 1978, this area was licensed as a Type II Landfill and later designated as a Type III Landfill to receive paper residuals and demolition wastes. The Type III Landfill is no longer permitted by the state and longer receives industrial or paper residual material. The other areas within the Landfill were used in the 1950's as dewatering lagoons for process paper residual waste generated by the former Allied Paper mills. These lagoon or disposal areas were not permitted because the disposal of PCB-contaminated residuals occurred prior to the promulgation of the Toxic Substances Control Act (TSCA) regulations.
- In response to question 6, no preparation activities have occurred at the Allied Paper Superfund Site for the transportation of the 132,000 cubic yards of PCB-contaminated soil.

Please feel free to contact me at (312) 353-8360, if you have any additional questions concerning these issues. Thank you for your interest.

Yours truly,

Sam Borries  
Federal On-Scene Coordinator

cc: